

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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RICHARD W. HADLEY
CLERK OF COURT

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U.S. OF THE DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BRYAN KANU

Plaintiff

-vs-

SIEMENS PLM, et al.,

Defendants

Case No. 1:18-cv-37

Honorable J. Black
Honorable M.J. Bowman

AMENDED COMPLAINT

I. Parties to the action

Plaintiff:

Bryan Kanu
2663 Wendee Dr.
Apt. 1919
Cincinnati, Ohio, 45238
513-884-5504

Defendants:

1. SIEMENS PLM SOFTWARE
5800 Grantie Parkway
Plano, TX 75024

2. UNIVERSITY OF CINCINNATI
2600 Clifton Ave.
University Hall
Cincinnati, Ohio 45220

3. CINCINNATI CHILDREN'S HOSPITAL MEDICAL CENTER
3333 Burnet Ave.
MLC 9010
Avondale, Ohio 45229

II. Subject Matter Jurisdiction

42 U.S.C. 2000e-5(f)(1)

42 U.S.C. 2000e-5(e)(A)(1)

Title VII of the Civil Rights Act

SEC. 2000e-2. *[Section 703] (a)(1)*

SEC. 2000e-2. *[Section 703] (a)(2)*

SEC. 2000e-1. *[Section 702](c)(1)*

SEC. 2000e-1. *[Section 702](d)*

III. Statements of Claim

- (1) **Claim 1:** From June-October of 2016, Siemens PLM Software unlawfully practiced employment discrimination against the plaintiff in their hiring processes when they unlawfully denied the plaintiff employment based on the plaintiff's race (African-American) and nation of origin (United States), in violation of SEC. 2000e-2. *[Section 703] (a)(1)*, SEC. 2000e-2. *[Section 703] (a)(2)*, SEC. 2000e-1. *[Section 702](c)(1)* and SEC. 2000e-1. *[Section 702](d)* of Title VII of the Civil Rights Act, injuring the plaintiff.
- (2) **Claim 2:** On or around December 14th, 2016 and on or around December 19th 2016, Cincinnati Children's Hospital Medical Center, in their hiring practices, unlawfully violated SEC. 2000e-2. *[Section 703](A)(1)* and Sec. 2000e-1. *[Section 702](d)* of Title VII of the Civil Rights Act, when they unlawfully practiced discrimination by using race as a determining factor to determine the compensation for the plaintiff, injuring the plaintiff.
- (3) **Claim 3:** The University of Cincinnati violated Sec. 2000e-1. *[Section 702](d)* of Title VII of the Civil Rights Act by discriminating against the plaintiff based on the combination of his race African American) and national origin (United States)

when they denied him admission to the International Co-Op Program (ICP) on June 21, 2016, by and through Gayle Elliott and Chris Cooper and SEC. 2000e-2. [Section 703](A)(1) and Sec. 2000e-1.[Section 702](d) of Title VII of the Civil Rights Act, injuring the plaintiff and unlawfully violating the Civil Rights Act. The University of Cincinnati also unlawfully used the Plaintiff's race and nation of origin to determine his compensation when they offered employment to the Plaintiff on or around December 14th 2016 and on or around December 19th, 2016.

IV. Previous/Other Related Lawsuits

Case No. 2018-00042 Bryan Kanu vs State of Ohio

Case No. 1:18-cv-38 Bryan Kanu vs Siemens PLM Software, et al.,

V. Relief

(4) Plaintiff demands judgment against Siemens PLM Software, or against the University of Cincinnati, or against Cincinnati Children's Hospital Medical Center, or against all of these defendants **in the sum of \$225,000,000.00** dollars in compensatory damages and **\$117,000,000.00** in punitive damages, as well as a **full-time position** with the title of **Software Engineer** with Siemens PLM **located in Milford, Ohio** upon completion of the plaintiff's studies at the University of Cincinnati with a yearly salary of **\$63,000.00**, a **\$9,000.00 signing bonus**, an **annual bonus of \$9,000**, **full medical benefits**, **paid time off**, **paid paternity leave**, **the ability to work from home occasionally**, **workspace close to a window**, **educational reimbursement**, and **investment and stock options**. Plaintiff also demands reimbursement of the plaintiff's

costs for any court costs and fees resulting from the filing of this formal complaint in the United States District Court for the Southern District of Ohio Western Division.

Respectfully submitted, under penalty of perjury. Executed on
this 12th day, of February, 2018.

s/ Bryan Kanu
2663 Wendee Dr. Apt. 1919
Cincinnati, Ohio 45238
bryan.kanu18@gmail.com